



May 8, 2019

via ECFS and e-mail

Michael Scott

Disability Rights Office, Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: GM Motion to Withdraw Petition for Exemption of Certain RTT Requirements
GN Docket No. 15-178**

Dear Mr. Scott,

The below-signed Consumer Groups and accessibility researchers support General Motor's motion to withdraw¹ its December petition to waive certain Real-Time Text (RTT) requirements for its upcoming automated ride-hailing service.² We agree that the RTT requirements the petition sought to waive appear, at least at this preliminary stage of the development of GM's service, to be inapplicable to the service. As we understand it, GM plans for the service to be a non-interconnected service with RTT functionality that GM intends to meet the relevant accessibility requirements of Rule 14.21(b). In light of recent discussions with GM and upon review of GM's motion, we support the Commission dismissing the petition without prejudice.

We appreciate GM's willingness to consult with Consumer Groups in resolving this issue and proactively addressing the accessibility of its service in advance of deployment.

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Please don't hesitate to contact me if you have any questions.

¹ General Motors Motion to Withdraw Petition for Partial Waiver of Real-Time Text Minimum Functionality Requirements (Apr. 25, 2019), <https://www.fcc.gov/ecfs/filing/10424068110597>.

² *Consumer and Governmental Affairs Bureau Invites Comment on a Petition Filed by General Motors Holding LLC for Partial Waiver of Real-Time Text Minimum Functionality Requirements*, Public Notice (Dec. 26, 2018) ("PN"), <https://docs.fcc.gov/public/attachments/DA-18-1301A1.pdf>; General Motors Petition (Dec. 11, 2018) ("GM Petition"), <https://www.fcc.gov/ecfs/filing/1211251984697>.

Respectfully submitted,

/s/

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